

## **Examples of Collection System Standards from Product Stewardship Laws & Regulations**

1. From Alameda County, CA's Safe Drug Disposal Ordinance (2012)  
Each Product Stewardship Program shall have a product stewardship Plan that contains each of the following: *(excerpted)*

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"3. A description of the methods by which Unwanted Products from Residential Generators will be collected in Alameda County and an explanation of how the collection system will be convenient and adequate to serve the needs of Alameda County residents; "

"4. A description of how the product stewardship Plan will provide collection services for Unwanted Products in all areas of Alameda County that are convenient to the public and adequate to meet the needs of the population in the area being served."

"5. The location of each collection site and locations where envelopes for a Mail-Back Program are available (if applicable);"

"9. A description of how the scope and extent of the Product Stewardship Program are reasonably related to the amount of Covered Drugs that are sold in the County of Alameda by the Producer or group of Producers; "

"12. A description of how collection sites for Unwanted Products may be placed at appropriate retail stores in Alameda County including a description of the involvement of the retail store. Retailers are not required or mandated to host collection sites and nothing in this Ordinance shall be interpreted as requiring such participation; and"
2. From WA State medicine take-back legislation (2011/2012)  
The product stewardship program must provide the following: *(excerpted)*

(1) A description of the proposed collection system. The collection system for all unwanted covered drugs must be safe, secure, and protect patient information. The collection system must be convenient and adequately serve the needs of residents in both urban and rural areas.  
The collection system must provide, at a minimum, one drop-off collection site in all counties in the state and one drop-off collection site in all cities with a population greater than ten thousand, on an ongoing, year-round basis.  
However, if a drop-off location cannot be arranged in a specific county or city, prepaid mailing envelopes must be provided;

(2) In accordance with requirements stated in sections 6(6) and 7 of this act, the collection system shall incorporate drop-off collection sites for unwanted covered drugs in existence on the effective date of this section if they meet program requirements, and additional collectors to improve convenience and availability of services;
3. From WA State Electronic Products Recycling Law (2006): *(excerpted)*

(1) A program must provide collection services for covered electronic products of all product types that are reasonably convenient and available to all citizens of the state residing within its geographic boundaries, including both rural and urban areas. Each program must provide collection service in every county of the state. A program may provide collection services jointly with another plan or plans.

(a) For any city or town with a population of greater than ten thousand, each program shall provide a minimum of one collection site or alternate collection service described in subsection (3) of this section or a combination of sites and alternate service that together provide at least one collection opportunity for all product types. A collection site for a county may be the same as a collection site for a city or town in the county.

(b) Collection sites may include electronics recyclers and repair shops, recyclers of other commodities, reuse organizations, charities, retailers, government recycling sites, or other suitable locations.

(6) The authority shall accept into the standard program covered electronic products from any registered collector who meets the requirements of this chapter.

8 (c) Collection sites must be staffed, open to the public at a frequency adequate to meet the needs of the area being served, and on an on-going basis.

## **Examples of Standards for Collection Protocols**

From Alameda County, CA's Safe Drug Disposal Ordinance

Each Product Stewardship Program shall have a product stewardship Plan that contains each of the following: *(excerpted)*

7. "A description of how the Unwanted Products will be safely and securely tracked and handled from collection through final disposal and the policies and procedures to be followed to ensure security; "  
*and*

D. "Packaging separation. Each Product Stewardship Program shall encourage Residential Generators to separate Unwanted Products from their original containers, when appropriate, prior to collection or disposal."

From WA State medicine take-back legislation

The product stewardship program must provide the following: *(excerpted)*

(5) A description of how covered drugs will be separated from packaging to the extent possible to reduce transportation and disposal costs and how drug packaging will be recycled to the extent feasible;

(6) The policies and procedures to be followed by persons in charge of unwanted covered drugs collected pursuant to the product stewardship program;

(7) A description of how the collected, unwanted covered drugs are tracked through to final disposal and how safety and security is maintained;

(8) A description of how patient information on drug packaging will be kept secure during collection, transportation, and disposal;

<b>Convenience Standard Example: Formula for Number of Collection Sites</b>		
1 collection site for every city in the county, plus		
1 additional site for every 30,000 population for cities with pop. > 60,000, plus		
1 additional site for every 30,000 pop. in unincorporated areas of the county.		
<b>Jurisdiction</b>	<b>2012 Pop. Est.</b>	<b>Number of Collection Sites</b>
All King County	1,957,000	
Incorporated King County	1,701,280	71
Unincorporated King County	255,720	9
<b>Cities Sorted by Population</b>	<b>2012 Pop.</b>	<b>Distribution of Collection Sites Per City</b>
1	Seattle	21
2	Bellevue	4
3	Kent	4
4	Renton	3
5	Federal Way	3
6	Kirkland	3
7	Auburn (part)	2
8	Redmond	1
9	Shoreline	1
10	Burien	1
11	Sammamish	1
12	Issaquah	1
13	Des Moines	1
14	SeaTac	1
15	Maple Valley	1
16	Mercer Island	1
17	Kenmore	1
18	Tukwila	1
19	Covington	1
20	Bothell (part)	1
21	Lake Forest Park	1
22	Snoqualmie	1
23	Enumclaw (part)	1
24	Woodinville	1
25	Newcastle	1
26	Duvall	1
27	Pacific (part)	1
28	Normandy Park	1
29	North Bend	1
30	Black Diamond	1
31	Algona	1
32	Medina	1
33	Clyde Hill	1
34	Carnation	1
35	Yarrow Point	1
36	Milton (part)	1
37	Hunts Point	1
38	Beaux Arts Village	1
39	Skykomish	1
<b>Total Number of Collection Sites</b>		<b>80</b>
Estimate for April 1, 2012 Population of Cities, Towns and Counties from Washington State Office of Financial Management, Forecasting Division based on 2010 census numbers.		

Local Hazardous Waste Management Program in King County. November 9, 2012.

## Summary of Number and Location of Pharmacies in King County

Initial Review by LHWMP staff has identified:

- 91 retail independent pharmacies (eg neighborhood pharmacies)
- 97 retail local chain pharmacies (eg Bartells, Fred Meyer, QFC, Top Food)
- 176 retail national chain pharmacies (eg Rite Aide, Safeway, Target, Walgreens, WalMart)
- 158 clinic/hospital pharmacies (eg community clinics, Group Health and area hospitals)

City	Number of Pharmacy Locations				Total per City
	Retail - Independent	Retail - Local Chain	Retail - National Chain	Clinical/Hospital	
Algona			1		1
Auburn (part)	3	3	6	9	21
Beaux Arts Village					0
Bellevue	7	10	14	14	45
Black Diamond					0
Bothell (part)		2	1	4	7
Burien	3	2	4	7	16
Carnation					0
Clyde Hill					0
Covington	1	1	3		5
Des Moines	1	2	2		5
Duvall	1		1		2
Enumclaw (part)	2	1	3	1	7
Federal Way	4	2	12	6	24
Hunts Point					0
Issaquah	1	4	6	4	15
Kenmore	2		2		4
Kent	7	5	12	5	29
Kirkland	3	7	8	10	28
Lake Forest Park			2		2
Maple Valley		2	1		3
Medina					0
Mercer Island	2		4	1	7
Milton (part)			2		2
Newcastle		1	1		2
Normandy Park	2				2
North Bend		1	1	1	3
Pacific (part)					0
Redmond	2	6	4	5	17
Renton	3	5	13	13	34
Sammamish		1	2	1	4
SeaTac			1	2	3
Seattle	44	35	55	68	202
Shoreline		5	8	1	14
Skykomish					0
Snoqualmie	1			2	3
Tukwila	1	1	3	3	8
Woodinville		1	4	1	6
Yarrow Point					0
Vashon Island	1				1
<b>TOTAL</b>	<b>91</b>	<b>97</b>	<b>176</b>	<b>158</b>	<b>522</b>
	<b>Retail - Independent</b>	<b>Retail - Local Chain</b>	<b>Retail - National Chain</b>	<b>Clinical/Hospital</b>	<b>ALL</b>

The following 9 cities in King County do not have a pharmacy:

Beaux Arts Village, Black Diamond, Carnation, Clyde Hill, Hunts Point, Medina, Pacific, Skykomish, Yarrow Point.

# Summary of Sharps Compliance Inc. TakeAway Environmental Return System in King County

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The Sharps Compliance, Inc. TakeAway Environmental Return System offers two pharmacy-based disposal options, mail-back and pharmacy drop-off, for unused or expired household medicines. Residents can dispose of pharmaceuticals and over-the-counter medications, including liquids. Controlled substances such as narcotics, stimulants and anti-depressants are not accepted.

## Mail-Back

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Residents can purchase the TakeAway Environmental Return System mail-back envelopes from several pharmacies in King County which include Walgreens, Rite Aid, Safeway, QFC and Fred Meyer pharmacies.

**Cost to Pharmacies:** Pharmacies may utilize the following TakeAway Environmental Return Systems:

1. Counter-top display: In use by Safeway, QFC and Fred Meyer pharmacies. The display is placed on the pharmacy counter and holds up to 25 11"x8" envelopes. Pharmacies purchase the display for \$99.75 (includes 25 envelopes), and then restock the envelopes at a cost of \$199.50 for 50, or \$872.50 for 250.
2. Shelf/Wall display: In use by Walgreens and Rite Aid. Individually boxed 11"x8" envelopes for stocking on pharmacy shelves and walls. Pharmacies purchase a case of 12 individually boxed envelopes at a cost of \$59.76, and restock at the same cost.

Pharmacies are not incurring costs for printing and outreach since they are not advertising the program. They were not able to estimate program costs associated with labor, but it is minimal and incorporated into their regular retail sales. They were also not able to estimate the average number of envelopes sold each year, but the program is not highly used in the pharmacies interviewed.

**Cost to Consumers:** King County residents pay \$2.99-\$3.99 per 11"x8" envelope, plus tax (price varies by pharmacy). The purchase price includes prepaid shipping, handling and disposal. The envelope holds about three pill bottles on average, for a weight of about six ounces to one pound. For twice the capacity, residents may also purchase a larger 15"x11" envelope online from Sharps Compliance at a cost of \$16.99 per envelope; this is the only envelope that is shipped via UPS instead of USPS.

**Process:** Residents place their medications inside the envelope in their original containers, and mail it directly to the Sharps Compliance treatment facility in Carthage, Texas. The final process for disposal is currently unknown.

## Pharmacy Drop-Off

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Alternately, pharmacies could choose to participate in the TakeAway Environmental Return System Drop-Off Box Program. The program allows residents to return their unused medications, in the original packaging, directly to the pharmacy for placement in a drop-off box. The pharmacy may charge a disposal fee to residents. When the box is full, the pharmacy mails it to the Sharps Compliance treatment facility for disposal.

Pharmacies may purchase the drop-off boxes from Sharps Compliance in two sizes: \$79 for a 10-gallon box or \$99-\$109 for 20-gallons. The purchase price includes prepaid shipping, handling and disposal. Both boxes have tamper-resistant packaging.

Currently, there are no King County pharmacies participating in the TakeAway Environmental Return System Drop-Off Box Program.

## **Sources**

1. Claude Dance, Sharps Compliance, Inc. Executive Vice President of Sales & Marketing (phone). June 28, 2012.
2. TakeAway Environmental Return System™ Receiving & Disposal of Unused Medications: <http://www.disposemymeds.org/index.php/in-the-news/articles/52>. Accessed June 25, 2012.
3. Sharps Compliance, Inc., Unused Medications Disposal: <http://www.sharpsinc.com/learning-center/unused-medication-disposal>. Accessed June 25, 2012.
4. Sharps Compliance, Inc., Unused Medications Solutions: <http://www.sharpsinc.com/store/unused-medication-solutions.html>. Accessed June 25, 2012.
5. Sharps Compliance, Inc., Search for Pharmacy Locations: <http://www.sharpsinc.com/locations>. Accessed June 25, 2012.
6. Veronica Fincher, LHWMP, phone interviews with pharmacy staff at Walgreens, Safeway, Fred Meyer, QFC, and Rite Aid pharmacies located in King County, WA on program costs and number of envelopes sold. June 26, 2012.